

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 22-40 (JRT/LIB)

UNITED STATES OF AMERICA,

Plaintiff,

v.

(1) HARSHKUMAR RAMANLAL PATEL,  
a/k/a "Dirty Harry,"  
a/k/a Harry Patel,  
a/k/a Param Singh,  
a/k/a Haresh Rameshlal Patel,  
a/k/a Harshkumar Singh Patel, and  
(2) STEVE ANTHONY SHAND,

SUPERSEDING  
INDICTMENT

8 U.S.C. § 1324(a)(1)(A)(i)  
8 U.S.C. § 1324(a)(1)(A)(ii)  
8 U.S.C. § 1324(a)(1)(A)(v)  
8 U.S.C. § 1324(a)(1)(B)(i)  
8 U.S.C. § 1324(a)(1)(B)(iii)

Defendants.

THE UNITED STATES GRAND JURY CHARGES THAT:

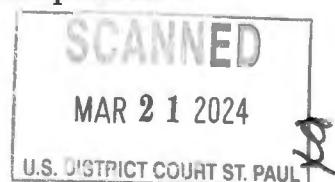
COUNT ONE

Conspiracy To Bring Aliens to the United States Causing Serious Bodily Injury and  
Placing Lives in Jeopardy

On or about January 19, 2022, in the District of Minnesota and elsewhere, the  
defendant,

HARSHKUMAR RAMANLAL PATEL,  
a/k/a "Dirty Harry,"  
a/k/a Harry Patel,  
a/k/a Param Singh,  
a/k/a Haresh Rameshlal Patel,  
a/k/a Harshkumar Singh Patel,

did knowingly and intentionally combine, conspire, confederate and agree with others  
known and unknown to the Grand Jury, knowing that persons were aliens, to bring  
and attempt to bring to the United States in any manner whatsoever such persons at



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a place other than a designated port of entry or place other than as designated by the Commissioner, regardless of whether such aliens had received prior official authorization to come to, enter, and reside in the United States and regardless of any future official action which may be taken in respect to such aliens, causing serious bodily injury and placing in jeopardy the life of such aliens, all in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(i), 1324(a)(1)(A)(v)(I), and 1324(a)(1)(B)(iii).

**COUNT TWO**

**Aiding and Abetting Bringing Aliens to the United States Causing Serious Bodily Injury and Placing Lives in Jeopardy**

On or about January 19, 2022, in the District of Minnesota and elsewhere, the defendant,

**HARSHKUMAR RAMANLAL PATEL,  
a/k/a "Dirty Harry,"  
a/k/a Harry Patel,  
a/k/a Param Singh,  
a/k/a Haresh Rameshlal Patel,  
a/k/a Harshkumar Singh Patel,**

and others, aided and abetted by each other and others known and unknown to the Grand Jury, did knowingly bring, and attempt to bring, in any manner whatsoever, aliens to the United States, in any manner whatsoever such persons at a place other than a designated port of entry or place other than as designated by the Commissioner, regardless of whether such aliens had received prior official authorization to come to, enter, and reside in the United States and regardless of any future official action which may be taken in respect to such aliens, causing serious bodily injury and placing in jeopardy the life of such aliens, all in violation of Title 8,

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United States Code, Sections 1324(a)(1)(A)(i), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(iii).

**COUNT THREE**

Bringing or Attempting To Bring Aliens to the United States Causing Serious Bodily Injury and Placing Lives in Jeopardy

On or about January 19, 2022, in the District of Minnesota and elsewhere, the defendant,

**HARSHKUMAR RAMANLAL PATEL,  
a/k/a "Dirty Harry,"  
a/k/a Harry Patel,  
a/k/a Param Singh,  
a/k/a Haresh Rameshlal Patel,  
a/k/a Harshkumar Singh Patel,**

knowing that persons were aliens, did bring and attempt to bring to the United States in any manner whatsoever such persons at a place other than a designated port of entry or place other than as designated by the Commissioner, regardless of whether such aliens had received prior official authorization to come to, enter, and reside in the United States and regardless of any future official action which may be taken in respect to such aliens, causing serious bodily injury and placing in jeopardy the life of such aliens, all in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(i) and 1324(a)(1)(B)(iii).

**COUNT FOUR**

Conspiracy To Transport Aliens Causing Serious Bodily Injury and Placing Lives in Jeopardy

On or about January 19, 2022, in the District of Minnesota and elsewhere, the defendants

**HARSHKUMAR RAMANLAL PATEL,**

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**a/k/a "Dirty Harry,"  
a/k/a Harry Patel,  
a/k/a Param Singh,  
a/k/a Haresh Rameshlal Patel,  
a/k/a Harshkumar Singh Patel, and  
STEVE ANTHONY SHAND,**

did knowingly and intentionally combine, conspire, confederate and agree with others, known and unknown to the Grand Jury, to commit the following offense against the United States: to transport and move, and attempt to transport and move, by means of transportation or otherwise, aliens who entered and remained in the United States in violation of law, knowing and in reckless disregard of the fact that said aliens came to, entered, and remained in the United States in violation of law, and in furtherance of such violation and during and in relation to which caused serious bodily injury and placed in jeopardy the life of such aliens, all in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(I), and 1324(a)(1)(B)(iii).

#### **COUNT FIVE**

**Aiding and Abetting the Transport of Aliens in the United States Causing Serious Bodily Injury and Placing Lives in Jeopardy**

On or about January 19, 2022, in the District of Minnesota and elsewhere, the defendants,

**HARSHKUMAR RAMANLAL PATEL,  
a/k/a "Dirty Harry,"  
a/k/a Harry Patel,  
a/k/a Param Singh,  
a/k/a Haresh Rameshlal Patel,  
a/k/a Harshkumar Singh Patel, and  
STEVE ANTHONY SHAND,**

aided and abetted by each other and others known and unknown to the Grand Jury,

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did knowingly to commit the following offense against the United States: to transport and move, and attempt to transport and move, by means of transportation or otherwise, aliens who entered and remained in the United States in violation of law, knowing and in reckless disregard of the fact that said aliens came to, entered, and remained in the United States in violation of law, and in furtherance of such violation and during and in relation to which caused serious bodily injury and placed in jeopardy the life of such aliens, all in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(iii).

**COUNT SIX**

**Transportation of Aliens in the United States Causing Serious Bodily Injury and Placing Lives in Jeopardy**

On or about January 19, 2022, in the District of Minnesota and elsewhere, the defendants,

**HARSHKUMAR RAMANLAL PATEL,  
a/k/a "Dirty Harry,"  
a/k/a Harry Patel,  
a/k/a Param Singh,  
a/k/a Haresh Rameshlal Patel,  
a/k/a Harshkumar Singh Patel, and  
STEVE ANTHONY SHAND,**

did knowingly transport and move, and attempt to transport and move, by means of transportation or otherwise, aliens who entered and remained in the United States in violation of law, knowing and in reckless disregard of the fact that said aliens came to, entered, and remained in the United States in violation of law, and in furtherance of such violation and during and in relation to which caused serious bodily injury and placed in jeopardy the life of such aliens, all in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(B)(iii).

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On or about January 19, 2022, in the District of Minnesota and elsewhere, the defendants,

**HARSHKUMAR RAMANLAL PATEL,  
a/k/a "Dirty Harry,"  
a/k/a Harry Patel,  
a/k/a Param Singh,  
a/k/a Haresh Rameshlal Patel,  
a/k/a Harshkumar Singh Patel, and  
STEVE ANTHONY SHAND,**

did knowingly transport and move, and attempt to transport and move, by means of transportation or otherwise, aliens who entered and remained in the United States in violation of law, knowing and in reckless disregard of the fact that said aliens came to, entered, and remained in the United States in violation of law, and in furtherance of such violation for the purpose of commercial advantage and private financial gain, all in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and 1324(a)(1)(B)(i).

**FORFEITURE ALLEGATIONS**

Counts 1 through 7 of this Superseding Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 982(a)(6).

Upon conviction of the offenses in Counts 1 through 7 of this Superseding Indictment, the Defendants shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(6):

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- (A) any conveyance, including any vessel, vehicle, or aircraft used in the commission of the offense; and
- (B) any property, real or personal –
  - i. that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense; or
  - ii. that is used to facilitate, or is intended to be used to facilitate, the commission of the offense.

The property to be forfeited includes, but is not limited to, the following: two black-colored Samsung cellular telephones bearing IMEI numbers 359011830852004 and 350336260884618 and one blue-colored Apple iPhone bearing IMEI number 353869220320890.

If any of the above-described forfeitable property is unavailable, the United States intends to seek the forfeiture of substitute property as provided in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1).

A TRUE BILL

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UNITED STATES ATTORNEY

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FOREPERSON